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Via ECF

The Honorable Colleen McMahon
 United States District Judge
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *In re: New York City Policing During Summer 2020 Demonstrations,*
 No. 20-CV-8924

This Filing is Related to: Payne v. de Blasio, 20 Civ. 8924; Gray, et al v. City of New York, et al, No. 21-cv-06610; and Rolon, et al v. City of New York, et al, No. 21-cv-2548.

Dear Judge McMahon:

We represent the Payne plaintiffs in this matter and write jointly on behalf of the City of New York defendants and plaintiffs in *Gray* and *Rolon* matters to seek an extension of the plaintiffs' time to move for reasonable attorney's fees, expenses and costs related to their injunctive claims until May 15, 2024.

On April 17, 2024, see Dkt. No. 1167, this Court entered an order pursuant to Rule 41(a)(2) dismissing the plaintiffs' injunctive claims with prejudice and incorporating the Settlement Agreement approved by the Court on February 7, 2024, Dkt. No. 1147. The parties have been in discussions to resolve the claim for attorneys' fees, expenses, and costs without the need for formal application to the Court and need additional time to do so. Accordingly, plaintiffs ask that the Court extend the deadline to submit a stipulation from May 1 until May 15, 2024. Defendants consent to this application.

Thank you for your attention to this matter.

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

By: s/Molly Biklen

Molly K. Biklen
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
mbiklen@nyclu.org